

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

ANN JOHNSON, AS THE REPRESENTATIVE
OF A CLASS OF SIMILARLY SITUATED
PERSONS, AND ON BEHALF OF THE ROYAL
CARIBBEAN CRUISES LTD. RETIREMENT
SAVINGS PLAN,

Civil No. 1:22-cv-21735-RNS/GOODMAN

Plaintiff,

v.

RUSSELL INVESTMENTS TRUST COMPANY
(F/K/A RUSSELL TRUST COMPANY), ROYAL
CARIBBEAN CRUISES LTD., AND ROYAL
CARIBBEAN CRUISES LTD. INVESTMENT
COMMITTEE

Defendants.

**DEFENDANTS' JOINT RESPONSE TO
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

Defendants, Russell Investments Trust Company, Royal Caribbean Cruises Ltd., and the Royal Caribbean Cruises Ltd. Investment Committee (collectively, the “Defendants”), by and through their undersigned counsel, respond to the Motion for Class Certification and Incorporated Memorandum of Law filed by Plaintiff Ann Johnson on March 22, 2024 (ECF Nos. 149 and 152) (the “Motion for Class Certification”), as follows:

Having reviewed the Motion for Class Certification, and accompanying declaration and exhibits, and having recently taken the deposition of Plaintiff Ann Johnson, Defendants do not oppose the Motion for Class Certification. Defendants reserve the right to move for decertification should ongoing fact and expert discovery in this action provide appropriate grounds to do so. *See Culpepper v. Irwin Mortg. Corp.*, 491 F.3d 1260, 1275 (11th Cir. 2007) (“Under Rule 23(c)(1) of

the Federal Rules of Civil Procedure, district courts are free to revisit the initial decision to certify a class, in light of subsequent developments in the case.”).

Date: April 26, 2024

Respectfully submitted,

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/s/ Alejandro J. Paz

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Ltd. Investment Committee*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of April, 2024, I electronically filed the foregoing document via CM/ECF, which caused a true and correct copy to be served electronically upon all entitled parties.

/s/ Alejandro J. Paz
Alejandro J. Paz